

**AHMAD KESHAVARZ**

*Attorney at Law*

16 COURT ST., #2600  
BROOKLYN, NY 11241

[WWW.NEWYORKCONSUMERATTORNEY.COM](http://WWW.NEWYORKCONSUMERATTORNEY.COM)  
E-mail: [ahmad@NewYorkConsumerAttorney.com](mailto:ahmad@NewYorkConsumerAttorney.com)

Telephone: (718) 522-7900  
Fax: (877) 496-7809

January 27, 2023

**VIA ECF**

Magistrate Judge Lois Bloom  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Consent motion to amend to correct name of Collins Asset Group, LLC.**

*Texidor v. Tromberg, Morris & Poulin, PLLC, et al.*, No. 1:21-cv-04845-RPK-LB

Dear Judge Bloom:

The undersigned represents the Plaintiff Luz Texidor in this lawsuit against Defendants Tromberg, Morris & Poulin, PLLC f/k/a Stephen Einstein & Associates, P.C. (“Tromberg”), Stephen Einstein (collectively with Tromberg, “Tromberg Defendants”), Collins Asset Group, Inc. (“CAG”), ABC Process Serving Bureau, Inc. d/b/a ABC Process Service (“ABC”), Jay Brodsky (collectively with ABC “ABC Defendants”) and Azzam Abderrahman for violations of the FDCPA and related state law.

Counsel for Collins Asset Group, LLC has notified Plaintiff’s counsel that Collins Asset Group is misidentified in this lawsuit as “Collins Asset Group, Inc.” Plaintiff’s counsel apologizes for this clerical error. Accordingly, Plaintiff moves to file a Third Amended Complaint correcting the name of the Defendant “Collins Asset Group, Inc.” to the proper name Collins Asset Group, LLC. Counsel for appearing defendants consent to this request. Counsel for ABC Defendants state that the amendments do not alter their pending Motion to Dismiss.

Respectfully,

/s/

Ahmad Keshavarz, Esq.